

**REMARKS**

**Claim Status**

Claims 1-25 and 29 are pending in the application. This paper amends claims 2, 5, 8, 11, 20, 21, 24, 25, and 29; does not cancel any claims; and does not add any new claims. Claims 1, 2, 22, 24, and 29 are the independent claims of the application.

**Art Rejections**

Claims 1, 2, 9-11, 14, 15, 20, 21, 24, 25, and 29 stand rejected under 35 U.S.C. § 102 as being anticipated by Bates *et al.*, U.S. Patent Number 5,877,766 (“Bates” in this paper).

Claims 3-8, 16-19, 22, and 23 stand rejected under 35 U.S.C. § 103 as being unpatentable over Bates in view of Finseth *et al.*, U.S. Patent Number 6,271,840 (“Finseth”).

Claims 12 and 13 stand rejected under 35 U.S.C. § 103 as being unpatentable over Bates in view of Katinsky *et al.*, U.S. Patent Number 6,452,609 (“Katinsky”).

For the following reasons, Applicant respectfully traverses the rejections, and requests reconsideration and allowance of all pending claims.

Independent claim 1 recites a categorization structure that *enables a user viewing content of any category title in the categorization structure to retrieve content of any other category title in the*

*categorization structure using a single retrieval command.* In rejecting this claim, the Office Action asserted that Bates discloses the claimed categorization structure in Figure 1; it appears that this assertion refers specifically to Bates's map display 60. Applicant notes that Bates's "map display is typically constructed dynamically based upon user navigation through linked records or documents." Bates, col. 16, lines 14-16. This method therefore requires "navigation" and consequent retrieval of the linked records or documents before the map is constructed. The user would then retrieve again using the map. Bates also discloses automatic generation of a map display through a search. Bates, col. 31, line 53, through col. 34, line 42. The search method also apparently retrieves the searched documents. *See* Bates, col. 32, lines 7-11.

However Bates's map display is created, multiple retrieval commands are necessary to retrieve a document using the map display. Applicant respectfully submits that Bates does not anticipate independent claim 1 at least for this reason.

Independent claims 2, 24, and 29 recite limitations identical, analogous, or similar to those discussed above in relation to claim 1, and stand rejected on the same ground as claim 1. Applicant respectfully submits that Bates fails to anticipate each of these independent claims at least for the reasons discussed above with respect to claim 1.

Independent claim 29 further recites that each web page of the plurality of interlinked web pages comprises a starting symbol for a gateway to viewing a categorization tree structure. Bates's map displays are not comprised in each of the web pages. *E.g.*, Bates, Figure 1. Applicant respectfully submits that Bates does not anticipate claim 29 for this additional reason.

Independent claim 22 recites limitations identical, analogous, or similar to those discussed above in relation to claim 1. Claim 22 stands rejected as being unpatentable over Bates in view of Finseth. Finseth does not remedy the deficiencies of Bates noted above, and therefore the two references do not disclose all limitations of claim 22.

Moreover, the purported motivation to combine Bates and Finseth given in the Office Action is insufficient to support the combination. The motivation given is a recitation of what can be done, not an explanation of why a person ordinarily skilled in the art would be motivated to combine.

Applicant respectfully submits that independent claim 22 is patentable over Bates and Finseth at least for the above reasons.

Regarding dependent claims 3-8, 16-19, and 23, Applicant notes that the purported motivation to combine the references given in the Office Action is insufficient to support the combination, as is discussed above in relation to claim 22. Applicant respectfully submits that claims 3-8, 16-19, and 23 are separately patentable over the references at least for this reason.

Dependent claim 16 recites that the categorization structure resides with the pages of media content but is not displayed on the display device with the media content until a browser places the cursor on the starting symbol. Dependent claims 19 and 25 recite identical, analogous, or similar limitations. Bates's map displays do not reside with the pages of media content, but are displayed independently. Applicant respectfully submits that claims 16, 19, and 25 are separately patentable over the references at least for this reason.

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Dependent claims that have not been specifically addressed in the above arguments should be patentable at least for the same reasons as their respective base claims and intervening claims, if any.

**CONCLUSION**

For the foregoing reasons, Applicant respectfully submits that all pending claims are patentable. To discuss any matter pertaining to the present application, the Examiner is invited to call the undersigned attorney at (858) 720-9431.

Having made an effort to bring the application in condition for allowance, a timely notice to this effect is earnestly solicited.

Respectfully submitted,

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